

1 A We give it to them for that, and I would like to
2 point out to you that we also have with the public safety
3 every Saturday from 3:00 until 4:00 we also have consumer,
4 licenses on consumer also from 4:00 to 4:30 and we give them
5 the time, which is also government.

6 Q How did this understanding come about between
7 Family Broadcasting and the government of the Virgin
8 Islands?

9 A I have spoken to the commissioners and let them
10 know that we should be, or I should say, prompt him becoming
11 who is responsible for the collection of government funds.
12 Okay? I told him that we, I'd given the government the
13 opportunity to use the radio station from 3:00 until 4:00
14 for public safety and from 4:00 to 4:30 and if we were
15 charging we would charge at least, we should be charging at
16 least \$450 an hour and they're on every Saturday. So you
17 multiply four weeks in a month you will have approximately
18 \$1800 there that the government would have had to pay us,
19 and we have to pay the government \$450 per month. So we are
20 losing.

21 Q This is an arrangement that you made with somebody
22 in the Virgin Islands Government?

23 A With public safety, with public safety who gives
24 the time and with property and procurement. That's what I
25 said, property and procurement.

1 Q So there's more than one place that Family
2 Broadcasting has this arrangement? I'm just trying to
3 understand --

4 A Oh, yes.

5 Q -- who's involved here.

6 A That makes me -- You have public safety which is
7 the police department.

8 Q Okay.

9 A They have a program every Saturday from 3:00 until
10 4:00. If we were charging them we would charge at least
11 \$450 for hour for the use of the airways. Okay? But it is
12 given to them free of charge in lieu for what we should be
13 paying them. In addition to that we have licensing and
14 consumer which is another part of government and they're on
15 every Saturday from 4:00 to 4:30 and they do not pay either,
16 and I would like to point out something.

17 That is, we have the radio station in 1970, 1995.
18 First in 1989 we had a terrible hurricane which was Hugo.
19 We acquired the radio, I acquired the radio station after
20 Hugo and we became officially owned. We officially owned
21 the station as of 1990, September 18, 1990.

22 In 1995, we had another terrible hurricane which
23 was Marilyn. Marilyn came in destroyed a lot of things in
24 the Virgin Islands including our tower and we suffered with
25 the roof of the house which we repaired ourselves and put

1 back. FEMA came into the Virgin Islands and FEMA remained
2 in the Virgin Islands for about three months on the Island
3 of St. Croix and every Monday and every Saturday we give
4 FEMA an hour and a half so that they can broadcast to the
5 general public the condition of how things are, and we have
6 never charged FEMA a single penny. That is the answer right
7 there.

8 Q FEMA still broadcasts or are you talking about a
9 three month period following the Marilyn?

10 A No. For the three month period following the
11 Marilyn we permitted them to use the airwaves without having
12 to pay.

13 Q The arrangement that you've described for the
14 Virgin Islands Government that involved the Saturday time
15 from 3:00 to 4:00 and from 4:00 to 4:30 is there a person
16 that Family currently deals with in order to ensure that
17 that arrangement stays in place?

18 A It's with property and procurement. Whoever comes
19 in for property and procurement they will call me and I
20 would go in and sit down and talk with them about it.

21 Q So when did you last have such a conversation?

22 A Oh, that was years ago. Oh, God. The police have
23 been there since we started the radio station. They didn't
24 just come in. We are now there 12 years, and public safety
25 has had its program from the time we started from our

1 inception up to the present time.

2 Q Is there a current written lease agreement with
3 the Government of the Virgin Islands for the Fort Louise
4 Augusta location?

5 A There is a written lease agreement. I would have
6 to search for it. To tell you where it is at the present
7 time, I couldn't say, but there was a lease agreement which
8 was brought to me for the rent of the place of \$450 a month.
9 I remember talking with the commissioner, and they have
10 changed so many commissioners now it's not funny. So we let
11 them know that we are giving our time to public safety and
12 we should offset that.

13 Another thing we do, normally we charge, I'll give
14 you an idea. We charge \$450 for the rental of the use of
15 the registration to any, if you are not, if you're a church,
16 the church pays \$100. It's the word of God that is being
17 proclaimed and we charge them \$100. The record is there to
18 show. They can stay for the whole hour, but if you off the
19 street come in and you want to take the radio station, use
20 the airwaves for an hour, you have to pay \$450.

21 Q You indicated that the last time you spoke
22 specifically with someone from the Virgin Islands Government
23 about the trade off arrangement that the company has with
24 the government was approximately how long ago?

25 A Oh, God. That was back from, I would say from

1 1993 we've been doing that.

2 Q Is there anything in writing from the Virgin
3 Islands Government that --

4 A Nothing in writing. There is no written agreement
5 between WSTX nor the government.

6 Q It's just a practice that has developed?

7 A It's just a practice that has been going on all
8 the time.

9 Q That even though your rental agreement says you
10 are supposed to pay the Virgin Islands, not you, Family
11 Broadcasting is supposed to pay \$450 a month that Family
12 Broadcasting doesn't have to write that check because the
13 Government of the Virgin Islands uses times at the radio
14 station on a regular basis?

15 A I made that very clear with them, with -- Excuse
16 me. That was back from, again, I say from 1993.

17 Q You have not had a conversation with anybody is
18 the Virgin Islands Government about this arrangement for
19 quite some time?

20 A No. I haven't, for quite some time I have not,
21 and they --

22 Q Do you know whether anybody --

23 A -- do not call us and say, hey, you have to pay X
24 number of dollars.

25 Q All right. Do you know whether anybody else

1 associated with Family Broadcasting, Inc. has had a
2 conversation with the government about this area.

3 A Not to my knowledge.

4 Q Outside of this arrangement with the Virgin
5 Islands Government are there any other entities that use the
6 facilities of WSTX or WSTX-FM where there has been an
7 arrangement similar to the one you've just described for the
8 Government of the Virgin Islands?

9 A Only the Government of the Virgin Islands has that
10 kind of arrangement with us that I, to my knowledge, that we
11 operate, and the churches, the price of the church hour is
12 fixed with the word of God. Any church can take an hour for
13 \$100.

14 Q That arrangement had been in place for
15 approximately how many years?

16 A That has been from the time I started, 1990. I
17 made it my business that with the word of God being
18 proclaimed we charge \$100, but if anybody off the street
19 comes in to take an hour on the radio they have to pay \$450.

20 Q Are there any churches that currently use the
21 facilities of WSTX?

22 A Yes, sir.

23 Q And what churches are they?

24 A Oh, my God.

25 Q If you can't remember the name of the church

1 itself, that's fine.

2 A I don't recall. Let me go through it. I have,
3 you have Holy Ghost Deliverance is one, you have St. John's
4 Anglican Church is another, you have St. Peter's Episcopal
5 Church is another. Then we have the Wesleyan Holiness
6 Church is another, Faith, Hope and Love Church is another,
7 you have the Word of God Ministries is another. There is
8 another one I have of a church, there's one that I just
9 don't recall the name off hand.

10 Q With respect to the Holy Ghost --

11 A Deliverance is a half an hour.

12 Q So that entity would pay \$50 for the half hour?

13 A That's correct, sir.

14 Q Is there a written or oral arrangement between
15 Family Broadcasting.

16 A Well, there's a form that has to be completed.

17 Q Form. Did the Holy Ghost --

18 A The hour churches you have, the St. Peter's
19 Episcopal Church and the St. John's Episcopal Church those
20 are the two, hour churches.

21 Q Oh, each of them is two hours?

22 A No. Those are hour churches, one hour churches.

23 Q One hour. Okay.

24 A Each of them one hour.

25 Q Okay.

1 Q The Wesleyan Holiness?

2 A Wesleyan Holiness is just 15 minutes.

3 Q Fifteen minutes. Faith, Hope and Love?

4 A Faith, Hope and Love is a half an hour, and then
5 there's --

6 Q Word of God Ministries.

7 A Word of God Ministries is a half an hour.

8 Q And then the church whose name you can't remember
9 right now?

10 A Another half an hour.

11 Q Is the arrangement between Family Broadcasting and
12 Holy Ghost something that you arranged or did somebody else
13 arrange it on behalf of Family Broadcasting?

14 A No. Those churches, I arranged all of those.

15 Q When was the most recent arrangement made?

16 A Oh, God. That's years.

17 Q So these have all been in place for years?

18 A These have been going for years, sir, and those --
19 The service of Faith, Hope and Love -- Excuse me. They
20 begin at 6:00 a.m. in the morning until 6:30 a.m. and then
21 there's another one that comes on from 6:30 a.m. I don't
22 recall the name, it's Pastor McIntosh, he's from 6:30 a.m..
23 This is Sunday mornings, I'm speaking about Sunday. Faith,
24 Hope is 6:00 in the morning and then Pastor McIntosh from
25 6:30 a.m. to 7:00 a.m. and then we have.

1 MR. COLBY: Do you mean McIntosh or McIntyre?

2 THE WITNESS: McIntosh. That's his name.

3 Reverend McIntosh is his name. Then we have special music
4 playing until 8 o'clock, no it's 6:30. We have Word of
5 Truth, I think is the name of it. He's a Spanish
6 individual, Nicolì, Senor Nicolì. So his is Spanish, but
7 he's for half an hour.

8 BY MR. SHOOK:

9 Q That is the one whose name you couldn't remember?

10 A No, no, no, no.

11 Q This is another one?

12 A McIntosh, I don't remember McIntosh's church's
13 name. It has slipped me at the moment.

14 Q Oh.

15 A Reverend McIntosh. So we have from 6:00 his
16 faith, 6:30 Reverend McIntosh. Then we come to 7:30, that's
17 the Spanish one, Nicolì. Word of God Ministries that's from
18 8:00 to 8:30, and 11 o'clock one of the churches I meant was
19 the Kingston Lutheran Church. This is all on Sunday.
20 Kingston Lutheran and they're on for an hour.

21 Then at 12:00 we have the St. John's Anglican
22 Church, and then at 1:00 we have the Holy Ghost Deliverance,
23 and then that goes until 1:30 and then we start again with
24 more spirituals at 5:30, 5:30 to 6:00, 5:30 to 6:15, that's
25 Reverend Masicott, and then at 6:30 is the St. Peter's

1 Anglican Church, and that's an hour, this is the hour, and
2 St. John's is the hour, and then at 7:30 is Reverend Hewitt
3 and then from 8:00 to 9:00 is the Midland Moravian Church,
4 that goes from 8:00 to 9:00, that's another hour because on
5 Sunday night I go on from 9:00 to 12:00 with prayer.

6 Like when our hurricane season we have a prayer
7 against hurricanes and this has been extremely successful,
8 prayer against hurricanes. You can question anybody in the
9 Virgin Islands and ask them about hurricanes and they'll
10 say, hey, we have had Hugo, Marilyn, we had Lenny. Lenny
11 came in unexpected and I started this about four years ago,
12 four or five years ago, since Marilyn, we're now in 62, 70,
13 since we're doing that I have this prayer against
14 hurricanes, and the only hurricane that we have had since I
15 started my hurricane prayer from 9:00 to midnight on every
16 Sunday is Lenny who just came out of nowhere and tore up the
17 Island.

18 Q I think you mentioned, you wrote down most of what
19 you've mentioned before.

20 A I wrote them all down here.

21 Q Let me just make sure. You had mentioned the Holy
22 Ghost Church.

23 A The Holy Ghost Deliverance.

24 Q All right, and then you mentioned St. John's.

25 A St. John's, yes, that's an hour.

1 Q You mentioned St. Peter's.

2 A That's another hour.

3 Q Then there was Wesleyan Holiness.

4 A Wesleyan Holiness. Okay, now let me point out.

5 Correction. Wesleyan Holiness another church, but they come

6 on, on Thursday. Like tomorrow morning they'll be on. No.

7 They're on this morning. Today's Thursday, right?

8 Q Today's Thursday.

9 A They were on this morning. They're on at 5:45

10 a.m. for 15 minutes, and then we have Pastor Gordon. His

11 church is, okay, Bethel A.M.E., A.M.E. Church and he comes

12 on every Friday at 5:30, 5:30 a.m. He's on 15 minutes. The

13 Wesleyan Holiness is every Thursday, 15 minutes. Pastor

14 Gordon is on with Bethel A.M.E. every Friday for 15 minutes.

15 Q Faith, Hope and Love?

16 A Faith, Hope and Love comes on Sundays. These are

17 the only two churches that come on days other than Sunday.

18 One Thursday and one Friday.

19 Q Each of the churches that you have mentioned has

20 their arrangement been worked out on behalf of Family

21 Broadcasting by yourself or by somebody else?

22 A By me.

23 Q Are there current contracts that cover each of

24 these churches.

25 A For these? These have been going so long that we

1 had them to sign the regular form, is what we had.

2 Q That signing took place a number of years ago?

3 A Many, many years ago, and it still continues.

4 Q So the current arrangement is more or less a
5 matter of practice in the sense that --

6 A Not a practice.

7 Q Is this a practice which you have any intention of
8 changing?

9 A With the word of God, sir, no sir. Unless they,
10 the pastor, is saying that he can't do it any longer. I
11 must say that we had one, the First Assembly of God, we had
12 him on Sunday from 6:00 to 6:30, but then he was moved from
13 St. Croix and I think he's going to another, I think he went
14 to Jamaica, and so the new pastor did not begin. He hasn't
15 started yet, but the time is there. So if the new pastor
16 decides to come in, then he can fall right into that slot
17 from 6:00 to 6:30.

18 Q Have you talked with the new pastor about it?

19 A I spoke with members of his Board and they're
20 supposed to get back to me.

21 Q How long ago did you speak with him?

22 A I would say about a month ago, and then too, I
23 should point out too -- May I have a piece of your paper,
24 sir? May I have a piece of your paper?

25 MR. COLBY: Sure.

1 THE WITNESS: I'm sorry I didn't, if I had brought
2 my bag I've got a yellow pad.

3 MR. COLBY: I may have an extra yellow pad.

4 MR. SHOOK: That's right. A lawyer must feel
5 naked without his yellow pad.

6 THE WITNESS: I always got my yellow pad, and I
7 left my bag in the hotel or else I would've been covered.
8 Okay. I have or I would like to point out to you as I
9 started to mention that I spoke about the First Assembly,
10 the First Assembly of God. This one used to be from 6:00 to
11 6:30, this is on Sunday with the rest of these, but again, I
12 say the pastor has been removed from St. Croix, now he's in
13 Jamaica, and the new pastor has not as yet started, but we
14 have there, we have some individuals like Evangelist Daisy
15 Charles, she's on for a half an hour from 4:30 to 5:00.

16 BY MR. SHOOK:

17 Q And that's on Sunday morning?

18 A No. That's on Saturday.

19 Q Oh, Saturday. Is that Saturday in the morning or
20 afternoon?

21 A No. Saturday afternoon.

22 Q And then we have another Evangelist, Maria
23 Branigan, and she is from 5:00 to 6:00.

24 Q Also on Saturday?

25 A That's on Saturday, and then we have Evangelists.

1 Our 5:00 went to him, who is -- We just recently been
2 signing one from 6:00, it's called Be Encouraged, Be
3 Encouraged Ministries and he goes on from 6:00 to 6:30 and
4 this is out of Brooklyn, New York, and this too is every
5 Saturday, and then another one that we have is Evangelist
6 Lucian Peterson, and he is on from 6:30 to 7:00.

7 Q Is that any relation with, any relationship with
8 your son-in-law?

9 A My son-in-law?

10 Q Right. Peterson?

11 A I really don't, I'll be honest with you I don't
12 know.

13 Q Okay.

14 A But I must say this, that we do not charge him
15 anything, and the reason for that is when we had to do work
16 on the building, which is owned by the government as I told
17 you, we have been right now they're painting it and he's out
18 there helping with the painting. So we don't charge him at
19 all, but the others that I mentioned they're paying.

20 Q The other, the first three that you mentioned, now
21 the Evangelist that broadcasts on Saturday?

22 A Yes?

23 Q Do they have current written understandings with
24 the station?

25 A Yes, that's been going for years also.

1 Q They're also charged the church rate?

2 A Church rate. The have an hour is 50 cents, 50
3 dollars for the half an hour. An hour for church, the word
4 of God, is \$100.

5 Q When was the last time that, when is the most
6 recent of these arrangements with the Evangelists roughly?

7 A Again, I say sir, they have been going for years,
8 and I can tell you they were all there up until last
9 Saturday.

10 Q Have you spoken with any of them within the last
11 year?

12 A Yes. They were there Saturday. I work on
13 Saturday.

14 Q Oh, okay, okay. So these are people who come to
15 the radio station?

16 A To the radio station.

17 Q Okay. I didn't understand. I didn't know whether
18 they might of sent their programming in via tape.

19 A No, no, no, no. They are live.

20 Q They're live.

21 A Daisy Charles, she comes there and she preaches
22 and this young lady I taught her in high school.

23 Q Maria Branigan?

24 A No, no, Daisy Charles.

25 Q Oh, okay.

1 A Maria Branigan is an elderly person.

2 Q How many days a week do you work at the radio
3 station?

4 A I'm on the radio every Saturday from 6:00 a.m. to
5 7:30 a.m., Saturday morning, and then I go back from 3:00 to
6 8:00 Saturday afternoon because that's when we have these,
7 I'm quite a church man myself. So I'm there with them with
8 these programs, and then I go back on Sunday from 9:00 to
9 midnight with my prayer against hurricanes.

10 Q Are you at the radio station any days other than
11 Saturday and Sunday?

12 A Unless one of the announcers can't come in or he's
13 sick, like when was it Tuesday, the Maria G. Hayward, she
14 took ill while at the station. She said she was coming down
15 with the flu and she called me at home and I went up there
16 and I sat in. She has a talk show. So when I got there I
17 told them I'm playing music, and I played music.

18 Q You didn't want to do the talk show?

19 A I had a talk show of my own. I did that on
20 Saturdays a lot. I used to do that a lot of times on
21 Saturday, but I just, I played more music then ever. I do a
22 lot of praying.

23 Q Do you currently have a talk show at the radio
24 station?

25 A Oh, yes, we got a talk show every day.

1 Q No, no. Do you currently have a radio talk show?

2 A No, I don't.

3 Q No. Okay. Are there any other occasions when you
4 go to the station on a regular basis?

5 A Well, I go to the station every day.

6 Q Is there any set time that you go or it varies
7 according to your desires?

8 A Well, let me explain something to you. I go to
9 walk every morning at 4 o'clock.

10 Q Four o'clock in the morning?

11 A Four o'clock in the morning, every morning sir.

12 Q Wow.

13 A Since I had my surgery, I'm out there every
14 morning at 4 o'clock, and I walk until 5:15 and then I will
15 get in my car and I go and pick up the newsman. His name is
16 Arthur Byrd, and I will pick him up from his home because he
17 doesn't have transportation and I take him to the radio
18 station. Then I take the fellow who is on midnight. His
19 name is Bolo. His right name is Warren Acosta, but we call
20 him Bolo, and I will pick him up from the radio station in
21 the mornings when I take the one fellow there. I pick him
22 up and take him home to Mon Bijou. I do that every morning
23 Monday through Friday.

24 Q Are there times other than that that you go to the
25 radio station Monday through Friday?

1 A If they need somebody and they call me, I go up
2 there.

3 Q What responsibilities other than those that you
4 have already talked about in terms of your own programs do
5 you have relative to the station?

6 A Relative to the station? I have none. The person
7 who runs the radio station is my daughter, Barbara Mae
8 Petersen, Barbara Mae James Petersen.

9 Q It's hard to keep all the names straight.

10 A No. That's all right. That's my daughter. She
11 has full control of the radio station. If she says to me
12 daddy I don't want you to go back to the radio station, then
13 I don't go there.

14 Q It must be an interesting situation having to take
15 orders from your daughter.

16 A No nothing wrong with that. Nothing wrong with
17 that at all.

18 Q I can understand taking orders from my wife, but
19 my daughter?

20 A I take orders from everybody. That's the way I
21 am.

22 Q How much time per week in a normal week does your
23 daughter spend at the radio station so far as you know.

24 A Oh, God, she spends a lot of time there. She's
25 there from morning until evening because let me give you my

1 schedule. Say I will walk in the morning. Go and pick up
2 the newsman, take him to the radio station, wait there until
3 -- We usually get to the radio station by ten minutes of
4 six, and then he would begin at 6 o'clock. They play music
5 and he gets his news ready to start at 6:30 and he goes from
6 6:30 to 8:00. Okay? I will then pick up the individual who
7 works, because we are 24 hours, pick up the individual,
8 Bolo, as I told you and take him way down in the country to
9 a place called Mon Bijou.

10 Then after I drop him, I hurry back to my house
11 and I pick up my granddaughters. I have two of them that I
12 have to take to the complex to class. So I take them down
13 there for 8 o'clock. So by 7:30 I'm back home already. I
14 pick them up, take them down there.

15 Q Now the granddaughters that you're talking about
16 at this point are these?

17 A One is Barbara's daughter and the other one is
18 Emmett's daughter, another of my son, Emmett. Remember I
19 mentioned Emmett who's in New York City?

20 Q Yes.

21 A His daughter is there with us at home.

22 Q Oh. That granddaughter resides with you at 83
23 Anna's Hope?

24 A Yes, sir.

25 Q Well, okay. To go back to the beginning one of

1 the things that I had asked you was who resided with you in
2 the family home and just so I'm clear on this, it's
3 yourself, your wife, Barbara --

4 A Yes. Her two children. Right.

5 Q Her two children who still live with her at this
6 point.

7 A Yes.

8 Q And then there is another grandchild?

9 A My granddaughter.

10 Q Granddaughter.

11 A Her name is Chanel, Chanel James.

12 Q And she is Emmett's daughter?

13 A That's Emmett's daughter.

14 Q Is there anybody else that resides at the family
15 home?

16 A We have a four bedroom house, bath, living room,
17 dining room, kitchen, a patio. It's quite a large place.

18 Q Now with respect to Family Broadcasting are you
19 currently a director?

20 A We turned, no, I turned everything over to my
21 daughter and my children.

22 Q Well, so, the answer to that question then would
23 be no?

24 A No. I'm not there in --

25 Q Are you currently an officer of Family

1 Broadcasting?

2 A I should not be an officer.

3 Q Okay. It's just, if you are you can say yes --

4 A I'm not.

5 Q If you're not you can say no. If you don't you
6 could I don't know.

7 A No. I'm not an officer.

8 Q All right. Are you currently a stockholder of
9 Family Broadcasting?

10 A I shouldn't be because I turned it over to my
11 children.

12 Q Well, just to alert you to something that you may
13 or may not be aware of, there is an application pending
14 asking the FCC permission to transfer the stock that you
15 owned to your children, but that application is still
16 pending.

17 A Okay, but I'm saying to you I'm glad that is being
18 done, but the way I look at it, the moment I relinquished my
19 authority to my children I shouldn't have anything to do
20 with it. When I --

21 Q Okay.

22 A -- say I've don't have anything to do with it I'm
23 not saying I shouldn't be on the radio. Don't get me wrong.

24 Q Right. No. That's not what we're talking about.

25 A I know, but the stockholders, everything goes with

1 it.

2 Q Are you saying then that you currently, I mean,
3 your understanding of the situation. Are you saying that
4 you do not own any stock in Family Broadcasting at this
5 point?

6 A I know I don't own any because I've turned
7 everything over to my children since I relinquished my
8 authority, all my rights to the station, at least that's the
9 way I look at it. Now you being an attorney you can tell me
10 if I'm wrong and what I should do, what's the proper
11 procedure.

12 Q You've got four attorneys here you could get four
13 different answers to a lot of questions, we won't go into
14 that. Anyway, in terms of your stock ownership, given your
15 understanding -- Let me start again.

16 Given your understanding that you do not currently
17 own any stock in Family Broadcasting, was there a time when
18 you did own stock in Family Broadcasting?

19 A Yes, before I turned the authority over to my
20 children, my wife and I owned everything with the
21 exception -- Wait. Let me go farther. With the exception
22 that we sold some shares

23 Q Right, we'll get into that.

24 A -- about \$10,000 worth, I'd say no more than
25 \$20,000 worth of shares.

1 Q We'll get into that. With respect to the stock
2 that you owned personally, do you know how many shares of
3 stock it was that you owned in Family Broadcasting?

4 A Well, I would take the liberty to say, sir, that I
5 in my opinion I owned the greater portion of the shares.

6 Q Okay. My question is more specific then that and,
7 again, if you do not know the answer and if it is an answer
8 that in order to answer properly you have to check some
9 records I can accept that, but my question at this point is
10 simply how many shares of Family Broadcasting, Inc. did you
11 own before you gave up control of that to your children?

12 A Well, to be honest with you, sir, I am of the
13 opinion that I would say that I had owned the greater
14 portion of the shares of stock with my wife and I'd say we
15 should have owned that jointly, I dare say about 85 percent
16 my wife and I.

17 Q Was there ever --

18 A Because, let me make it very clear, everything I
19 do my wife has a part in it.

20 Q I can understand that.

21 A That's the way I am. So I may not have gone to
22 say to her and say, hey, this you have, we have X number of
23 shares in here, but anything we do it's always a family,
24 it's together, and we have been that way for the past 51
25 years. Since I married that lady, you see, who is sitting

1 right there in the chair with me, 51 years.

2 Q I may be sounding repetitive here, but in terms of
3 your individual stock ownership of Family Broadcasting are
4 you saying that there was never a time when you personally
5 owned shares in Family Broadcasting?

6 A I would take the liberty of saying, sir, when I
7 purchased Family Broadcasting, when I purchased the radio
8 station and we named it Family Broadcasting in 1990 I knew
9 that it was not just me who owned it. It was me, my wife
10 and myself because everything we do, we do it together.

11 Q I understand that you may have had some kind of
12 understanding with your wife that was based on your
13 marriage. My question is more specific than that, and it is
14 simply --

15 A I would take the liberty to say that --

16 Q -- did you personally own stock in Family
17 Broadcasting, and if so, how many shares did you own?

18 A Sir, again, I'm saying when we purchased Family
19 Broadcasting we would have 100 percent shared in it. I
20 cannot, and I would not, as I sit here tell you that I owned
21 80 percent and my wife owned 20. I am saying if we have 100
22 percent we both own the whole thing. I can't make myself
23 clearer than that.

24 Q So I'm going to put it in my own words, and you
25 can tell me whether or not I have a correct understanding at

1 this point then. So what you're telling me is that from the
2 time Family Broadcasting, Inc. issued stock to the extent
3 such stock was issued to you, it was issued to you and your
4 wife jointly?

5 A Yes.

6 Q So that any ownership interest in Family
7 Broadcasting you had, you never had as an individual, but
8 you had with your wife.

9 A With my wife.

10 Q Now was there ever, and did that situation ever
11 change from the time the stock was issued up until the point
12 in time when you indicated that you gave control of that
13 stock to your children?

14 A Well, it's my understanding that when we turned
15 over the stock, or turned over the radio station, we give it
16 to my four children, and I would say that Barbara has the
17 controlling, she's the one who will say what's what with the
18 radio station because she's there on a daily basis.

19 Q But in terms of what you and your wife have done,
20 it's your understanding that your four children have an
21 equal share in the ownership of the radio station?

22 A Minus what was sold, I'd say about 10 percent.

23 Q Right. We'll, as I said, we'll get into that in a
24 little bit.

25 A Yes.

1 Q Do you know what the current value of Family
2 Broadcasting, Inc. is?

3 A If Family Broadcasting, Inc. had to be sold on the
4 market today I would recommend that my children accept no
5 less than 1.2 million.

6 Q Is that based on any appraisal that has occurred
7 within the last year?

8 A That's just based at the way I look at things,
9 okay. We've not had any appraisal done to my knowledge.

10 Q Do you personally have a will at this point?

11 A Last will and testament?

12 Q Yes, sir.

13 A No, not yet. My wife and I we've been talking
14 we're going to get one done.

15 Q Do you currently have any trust in place?

16 A We have none. No, sir.

17 Q Aside from Mr. Colby and Mr. Huber does anybody
18 else provide legal service of any kind to Family
19 Broadcasting, Inc.?

20 A In the Virgin Islands the only person who does any
21 legal work for Family Broadcasting is me, is myself, nobody
22 else.

23 Q When is the last time that you had any occasion to
24 do legal work for Family Broadcasting, Inc.?

25 A Well, if I'm saying if the matter comes up I'm the

1 only one who would be doing that, nobody else does it, but
2 we haven't done any legal work recently either than what my
3 daughter has Mr. Colby working on things.

4 Q Well, so with that in mind, when is the last time
5 that you had to do any legal work or did any legal work for
6 Family Broadcasting, Inc.?

7 A Well, I think that the last time that I did some
8 legal work was when you and I met before the Judge, wasn't
9 it?

10 Q Well, sir, we never had the opportunity to meet
11 prior to today. So it was somebody else who may have looked
12 like me, but it wasn't me.

13 A Not with the same name, with the same name?

14 Q No, sir.

15 A I remember we met before one of the Judges last
16 time you were up at the --

17 Q I'm sure I would have remembered any meeting with
18 you.

19 A It was up there. So what have I seen --

20 Q It was Judge Luton, I believe, that was before and
21 there was an attorney representing the Mass Media Bureau.

22 A I thought it was you.

23 Q No, sir.

24 A And there was a lady there also. I know it wasn't
25 this lady, but there was another lady.

1 Q Right. There was a lady, Jackie Ellington, I
2 believe.

3 A Ellington.

4 Q Right.

5 A And I think I saw a Shook.

6 Q Well, my name may have appeared some place, but I
7 didn't have the pleasure.

8 A Okay.

9 Q So is that the last time that you had --

10 A Yes, that was the last time that we went before
11 the Judge and the Judge ruled and that was it.

12 Q Right. Have you done any work for Family
13 Broadcasting, Inc. since that time?

14 A Me, other work?

15 Q Yes, sir.

16 A No, we have not, I have not.

17 Q Do you know who Francisco De Pusoir, I'm
18 probably --

19 A De Pusior?

20 Q De Pusior.

21 A Yes, he's the one who does all our accounting.
22 He's the accountant.

23 Q How long has he been Family's accountant.

24 A Well, he's been doing work for my son and that's
25 how I met him, and I dare say, I think they -- He prepared

1 the last income tax papers, I think it was, in 1998 or
2 something, that was the last thing that we've done. I've
3 been sick and I haven't had anything done at all because of
4 my illness which started back in 1995 and it grew, grew and
5 got to the point by 1998, and 1999 I was in the hospital,
6 oh, just a sad thing, yes.

7 Q So the last tax return that you're aware that has
8 been done for Family Broadcasting, Inc. was the 1998 return?

9 A 1998, I think, yes.

10 Q Is the 1999 return being worked on?

11 A Well, I don't know. I have to ask my daughter
12 about that and get her to get things together.

13 Q Is the 2000 return being worked on?

14 A I dare say that I heard her talking that they
15 going to get things up on it. When I go back I'll make
16 certain we get on it.

17 Q No. At this point my question is simply, you
18 know, whether you know.

19 A No. I don't recall.

20 Q And what about the 2001 tax return?

21 A I don't recall either.

22 Q Have you seen a what would be called a balance
23 sheet or balance statement for Family Broadcasting, Inc.

24 A No. I have not.

25 Q Have you seen an income statement for Family

1 Broadcasting, Inc.

2 A Recently, no, I have not.

3 Q When would the last one have been that you recall
4 seeing?

5 A That being the last one that was in 1998 when
6 what's his name fixed that thing, De Pusoir.

7 Q When was the last time that you recall seeing, if
8 ever, a stock ledger for Family Broadcasting, Inc.?

9 A I think it was in 1998.

10 Q Let's make sure we understand each other.

11 A Yes, stock ledger.

12 Q When I use the term stock ledger could you put in
13 your own words what you believe that means?

14 A When you're talking about a stock ledger you're
15 saying who owns what stock, is that what you're referring
16 to?

17 Q Right. If there's a written record of who owns
18 what stock?

19 A No, not to my knowledge, sir.

20 Q Do you personally have any stock certificates that
21 show your ownership or your ownerships and your wife's
22 ownership of Family Broadcasting, Inc.

23 A No, but I do have in my possession, in my office
24 shares which were sold to individuals.

25 Q Okay. I'm not worried about the other people at